

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

Case 3-18-cr-356-S

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v.

THOMAS D. SELGAS (1)
MICHELLE L. SELGAS (2)
JOHN GREEN (3)

MOTION TO COMPEL

COMES NOW, JOHN GREEN (“Defendant” or “Green”), and through his attorneys of record, asks this Court to direct the Attorney for the Government to:

Disclose a written summary the Government Expert witness, James Ehler, pursuant to Fedearl Rule of Criminal Procedure 16.

I.

The Government is required to provided a written summary of the testimony of its Epxerts under Federal Rule of Criminal Procedure 16. The government has proffered, John Ehler, as an expert witness on the vague issue of ethics regarding IOLTA accounts and handed the rules to the defendant. What is missing is the opinion of the Mr. Ehler. One can guess that they intend to say that Green unethically used his trust account, but trials are not supposed to be about speculation. That does not allow the defense to prepare for cross examination or a Daubert hearing.

II.

No expertise on IOLTA accounts is demonstrated in the C.V. of the expert, and no explanation of what unethical acts Green will be accused of. Rather, the government apparently is asking the defense to speculate.

CONCLUSION

The defense requests the Government disclose a written expert report.

Respectfully submitted on August 8, 2019.

MINNS & ARNETT

/s/ Michael Louis Minns

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Attorneys for John Green

CERTIFICATE OF SERVICE

This is to certify that on this 8th day of August 2019, a true and correct copy of the above and foregoing instrument was served upon all counsel of record.

/s/ Ashley Blair Arnett

Ashley Blair Arnett

Attorney for Defendant, John Green